

Provider Name: LCB Solutions Corp
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LCB Solutions Corp Robocall Mitigation Plan is premised upon a three-pronged set of technical and operational procedures, the details of which can be summarized as follows:

1) **Prevention:**

- a. **Customer Onboarding.** LCB Solutions Corp has a stringent on-board screening process designed to proactively identify and prevent those that may engage in illegal robocalling from becoming LCB Solutions Corp customers at the outset. Onboarding screening procedures will always take LCB Solutions Corp specific service provider role into account but the fundamentals of its on-boarding review procedures apply to all of LCB Solutions Corp Intermediate, domestic and VSP services alike and we consider them to be the core of our "Know Your Customer" practices, which also inherently include "Know Your Upstream Provider" now in the context of the Commission's updated rules and terminology in wholesale service model scenarios (collectively "KYC").

LCB Solutions Corp tracks and records government enforcement actions and ever evolving industry trends to have up-to-date information on problematic use cases and known bad actors. Accordingly, LCB Solutions Corp requires that all of its upstream service providers (who may themselves be "Intermediate Providers", "Gateway Providers", "Originating Voice Service Providers") customers maintain valid registrations in the FCC's Robocall Mitigation Database ("RMD") and requires clear service-specific contractual requirements in which customers agree to cooperate with the ITG and agree to follow all applicable laws against illegal robocalling, fraud and abuse.

b. Implementing Know your Customer Protocol

Consistent with the Wireline Competition Bureau's Caller ID Authentication Best Practices No. 16 and 47 C.F.R. § 64.1200(n)(3), LCB Solutions Corp. vets "the identity of retail and wholesale subscribers, in conjunction with (i) approving an application for service; (ii) provisioning of network connectivity; (iii) entering into a contract agreement; or (iv) granting the right-to-use telephone number resources."⁷ In so doing, LCB Solutions Corp. takes "affirmative, effective measures to prevent new and renewing customers from using its network to originate illegal calls, including knowing its customers and exercising due diligence in ensuring that its services are not used to originate illegal traffic."⁸ LCB Solutions Corp. has implemented appropriate Know Your Customer ("KYC") and Know Your Upstream Provider ("KYUP") protocols when onboarding new or renewing commercial and wholesale customers and providers. As part of its KYC and KYUP protocols, LCB Solutions Corp. requires any commercial/wholesale customer and provider to provide sufficient information to ensure its legitimacy. Among other things, LCB Solutions generally requires its customers and providers to provide the full legal name of the company (and its parent company if applicable), state or county of incorporation, the physical address of its operations, the billing name and address (when different), and contact name and telephone number, federal tax ID (if it is a U.S. entity), and nature of the customer's business. If the company is a Voice Service Provider, Foreign Voice Service Provider, Intermediate Provider, and/or Gateway Provider, LCB Solutions confirms, in accordance with currently effective FCC rules, that the company is listed in the FCC's RMD and has not been delisted pursuant to an enforcement action before accepting traffic from such entities. Our Company requires a traceback history covering the previous twelve months and sample traceback records. LCB Solutions' onboarding for its commercial/wholesale customers and providers also includes an application for service that can be used as a condition precedent to the initial establishment of service. The acceptance of an application or order for service by an applicant whose credit has not been duly established may be subject to the deposit, advance payment and/or refusal of service provisions described in LCB Solutions Corp's rates, terms and conditions. In addition, Our Company reserves the right to examine the credit record or other available external sources of credit of any applicant or customer. Customers without an established credit rating or with a negative credit rating are required to have a deposit with our Company in an amount equivalent of up to two months of actual or estimated monthly charges.

LCB Solutions Corp operations' personnel stay closely aligned with its customers and the industry's anti-robocalling efforts and developments to remind, educate and clarify what behaviors may signal or constitute unlawful robocalling, and continually notify customers when we identify instances that need their attention in order to prevent illegal robocalling behaviors on their networks.

In 2025, LCB Solutions Corp implemented an effort to update its attestation policies and

Wireline Competition Bureau Issues Caller ID Authentication Best Practices, WC Docket Nos. 17-97 and 20-324, DA 20-1526, at Appendix A (rel. Dec. 22, 2020) ("FCC's Caller ID

Authentication Best Practices"), *available at* <https://docs.fcc.gov/public/attachments/DA-20-1526A1.pdf>.

Practices for all of its customers where LCB Solutions Corp typically operates as a non-Gateway Intermediate Provider. LCB Solutions Corp notified potentially impacted existing customers of this change in detail and in writing on May 20, 2025. LCB Solutions Corp also established a new robust set of internal processes by which operations personnel engaged in an extensive KYC refreshed review of existing customers and their services. In this updated review, LCB Solutions Corp has collected a multitude of data points from and about its customers, including but not limited to use case descriptions and call flow diagrams. LCB Solutions Corp then analyzed and determined what it deemed to be the appropriate attestation levels for unsigned calls received from that customer in accordance with ATIS and FCC rules and objectives. The goal of LCB Solutions Corp practice is to work to enable originating caller transparency on an end-to-end basis as LCB Solutions Corp and the broader industry continues their mitigation efforts against illegal robocalling, fraud, and abuse.

2) Monitoring and Detection: IMPLEMENTATION OF SITR/SHAKEN LCB Solutions Corp has a team of operational experts who have implemented technical and operational processes and procedures to monitor, detect and analyze the use of its services and traffic on our network that helps to determine when

illegal and inappropriate robocalling activity may be occurring. LCB Solutions Corp has developed and deployed a "Call Blocking Tool" that incorporates industry best practices into its core network to identify and block invalid, unallocated and otherwise obviously illegal telephone numbers. Further, even though it acts predominantly as an "Intermediate Provider", LCB Solutions Corp implemented STIR/SHAKEN in its all-IP core network infrastructure long before it was mandated by the FCC and has been working to increase call detail transparency and collaborative traceback enablement for years.

When unlawful robocall campaigns are detected, LCB Solutions Corp follows established processes and procedures to notify upstream customers of the problematic traffic and request that they take immediate corrective actions to prevent recurrence of the illegal calls. LCB Solutions Corp engagement and support for the ITG Tracebacks also includes work to monitor that its upstream providers are effectively cooperating with the ITG and working to address the sources of each traceback event.

Requiring Contractual Provisions to Mitigate Illegal Robocalls

Voice service customers of LCB Solutions Corp are subject to robust terms and conditions that (1) obligate customers not to use LCB Solutions' services for unlawful purposes; and (2) preserve LCB Solutions' right to terminate customers for violations of the law, regulation, or industry practice. For its commercial/wholesale customers, LCB Solutions requires that they enter into a Master Service Agreement ("MSA") with LCB Solutions. LCB Solutions' standard MSA includes a termination clause for violations of federal, state, and local laws, rules, and regulations applicable to use of LCB Solutions' services or its equipment. LCB Solutions may suspend or terminate the MSA (and all services provided to a customer) immediately upon notice if a customer fails to cure any fraudulent or otherwise unlawful activity. LCB Solutions, at its sole option, may also terminate the MSA (and all services provided to a customer) immediately upon

notice if a customer fails to remedy a material breach of the MSA within 30 days, or the customer commits a material breach which cannot be remedied. Illegal robocalls are treated as a material breach under the MSA. In addition, the MSA permits LCB Solutions , after reasonable notice, to cancel/suspend any service which is determined to be in violation of any applicable law or regulation, and also prohibits the customer from operating in a manner that would violate any applicable international, federal, state or local law or regulation (including telemarketing sales rules, invasion of privacy and obscenity). Furthermore, the MSA requires customers to inform LCB Solutions before sending short duration traffic (i.e., calls of 6 second duration or less); prohibits customers from engaging in blasting activities (e.g., auto dialers, mass calling, fax blasting, etc.) without prior written approval; and permits LCB Solutions to take curative action (e.g., suspension/cancellation) for customer violations. LCB Solutions also retains the right to immediately suspend or terminate service (with or without warning) for violations of its Acceptable User Policy ("AUP"), which prohibits among other things: unauthorized/illegal/fraudulent use of services; falsifying call/IP information to mask the originator or for impersonation purposes; transmission/distribution/retrieval/storage of information/data/material in violation of any applicable law or regulation; and attempts to breach system and network security measures (e.g., unauthorized access, unauthorized monitoring, interference, fraud/forgery, denial of service attacks, virus transmission). Termination of service is a nonexclusive remedy for breach under the MSA (as well as violations of the AUP) and does not limit LCB Solutions ' right to seek additional remedies such as legal recourse to recover all costs involved in enforcement.

Validating Customer's Right to Use Telephone Numbers

LCB Solutions has processes and procedures in place to authenticate the proper use of telephone numbers associated with calls routed over the LCB Solutions and combat number spoofing. If required by applicable law or regulation, LCB Solutions requires its customers to fully implement STIR/SHAKEN on their own networks. In cases where a

customer is unable to fully implement STIR/SHAKEN, where permitted by applicable law or regulation, LCB Solutions may assist them with signing their traffic to ensure traceability of calls across the PSTN and ensure all FCC requirements for transiting traffic to US telecommunications networks are fulfilled. In cases where LCB Solutions signs traffic on behalf of a customer network, the customer must agree to additional contractual terms governing their traffic, use of phone numbers and specific obligations to investigate and prevent any suspected robocalling or otherwise fraudulent traffic. LCB Solutions' standard service order also contains language prohibiting the misuse of telephone numbers (i.e., DIDs). For instance, customers are required to allocate all DIDs used in call processing, and errors associated with unallocated DIDs are considered to be a misuse of DIDs which are subject to monetary penalties. LCB Solutions may also, in its sole discretion, take other actions under LCB Solutions' standard Service Order to address misuse of DIDs (or if LCB Solutions discovers or reasonably suspects any abuse or unlawful activity), including: commercially reasonable action on offending numbers in order to minimize misuse; verbal, e-mail or written warning notifying the customer of the misuse and the corrective action that must be taken; suspension, with or without warning, all or part of a customer's service; and/or termination, with or without warning, all or part of customer's service and may terminate customer's agreement. In addition, LCB Solutions' standard service order requires customers to cooperatively address unlawful use or misuse of DIDs in a timely manner. LCB Solutions also has processes and systems in place to ensure that customer telephone number assignment is properly inventoried and tracked. Prior to accessing LCB Solutions' telephone number portal to order telephone numbers, a customer must establish an account profile, which is established after customer vetting is complete, contracts finalized, and network services (e.g., trunk groups) ordered. Only approved customers may access the telephone number portal, and each customer has a LCB Solutions administrator assigned to their account.

Adhering to Prerequisites Before Accepting Traffic from Other Providers

Accepting traffic from domestic Voice Service Providers. In accordance with 47 C.F.R § 64.6305(e)(1), LCB Solutions only accepts calls directly from a domestic Voice Service Provider only if that Voice Service Provider's filing appears in the RMD and that filing has not been de-listed pursuant to an enforcement action. Accepting traffic from Foreign Voice Service Providers Foreign Intermediate Providers. In accordance with 47 C.F.R § 64.6305(e)(2), beginning April 11, 2023, LCB Solutions only accept calls directly from a Foreign Voice Service Provider or Foreign Intermediate Provider that uses North American Numbering Plan resources that pertain to the United States in the caller ID field to send voice traffic to residential or business subscribers in the United States, only if that foreign provider's filing appears in the RMD and that filing has not been de-listed pursuant to an enforcement action. Accepting traffic from Gateway Providers. In accordance with 47 C.F.R § 64.6305(e)(3), beginning April 11, 2023, LCB Solutions only accepts calls directly from a Gateway Provider only if that Gateway Provider's filing (a) appears in the RMD, (b) shows that the Gateway Provider has affirmatively submitted the filing, and (c) has not been de-listed pursuant to an enforcement action. Public safety blocking safeguards. Despite the above paragraphs in this Section, in accordance with 47 C.F.R § 64.6305(e)(4) and 47 C.F.R. § 64.1200(k)(5)-(6), LCB Solutions does not block a voice call if the call is an emergency call placed to 911. In addition, LCB Solutions makes all reasonable efforts to ensure that it does not block any calls from public safety answering points and government emergency numbers.

Automatically Blocking Calls on Do-Not-Originate List

In accordance with FCC Rules, 47 C.F.R. § 64.1200(k)(2), (n), and (o), LCB Solutions blocks any calls 7 purporting to originate from a number on a reasonable Do-Not-Originate ("DNO") list. This DNO only includes:

1. Numbers for which the subscriber to which the number is assigned has requested

that calls purporting to originate from that number be blocked because the number is used for inbound calls only;

2. North American Numbering Plan ("NANP") numbers that are not valid;

3. Valid NANP Numbers that are not allocated to a provider by the NANP Administrator; and

4. Valid NANP numbers that are allocated to a provider by the NANP Administrator, but are unused, so long as the provider blocking the calls is the allocate of the number and confirms that the number is unused or has obtained verification from the allocate that the number is unused at the time of blocking.

LCB Solutions Corp adheres to the requirements outlined in 47 C.F.R. § 64.1200(k), which directs voice service providers to employ a "reasonable" Do-Not-Originate list as part of their robocall mitigation obligations, consistent with the FCC's 2025 compliance deadline. In alignment with this mandate, LCB Solutions has invested in the Somos DNO solution and has fully integrated it into our call-processing systems to ensure comprehensive and up-to-date DNO coverage. LCB Solutions also incorporates DNO resources made available through the Industry Traceback Group (ITG), as appropriate, to further strengthen our ability to identify and block calls that purport to originate from numbers that should never generate outbound traffic.

Analyzing and Monitoring Network Traffic Routing Through LCB Solutions ' Network

Upon receiving call traffic, LCB Solutions also analyzes and monitors the call traffic that originates on, terminates to, or routes through our Vendor (Bandwidth, Infobip) ' voice network. Consistent with Principle #5 of the FCC's Caller ID Authentication Best Practices, LCB Solutions monitors the voice traffic patterns on a twenty-four (24) hour basis to identify behaviors that are consistent with illegal robocalling. If there are such

calling patterns, LCB Solutions, after further investigation, takes appropriate action to address such behaviors, including terminating the customers service or blocking the calls. As part of its analysis and monitoring of network traffic, LCB Solutions maintains a Network Operations Center ("NOC") that provides continuous oversight of LCB Solutions' voice service operations. LCB Solutions' NOC staff is available 24-7-365 basis. The NOC is staffed by technicians and supervisors that have access to network engineering and vendor resource support, including additional support in the event of escalation incidents. LCB Solutions also maintains a team whose goal is to prevent fraudulent calls and abuse; to detect and terminate such fraud should it occur; and to respond to fraud complaints, law enforcement inquiries and traceback requests. LCB Solutions uses specific email distribution lists (e.g., support@lcbisol.com) to ensure that fraud matters are directed to the appropriate team members and handled in a timely manner.

Third-Party Analytics Vendor

Pursuant to 47 CFR § 64.6305(d)(2)(ii), (e)(2)(ii), and (f)(2)(ii), LCB Solutions Corp is required to 8 describe whether it uses any third-party analytics vendor(s) and the name(s) of such vendor(s). LCB Solutions Corp. engages the services of a third-party analytics vendor; more specifically, LCB Solutions utilizes the services of TNS Call Guardian.

Investigating Suspicious Calling Patterns

When analyzing and monitoring call traffic, if LCB Solutions discovers call patterns that are consistent with illegal robocalling, LCB Solutions, after further investigation, takes appropriate action to address such behaviors and mitigate such traffic. These measures include, but are not limited to, working with the originating customer to resolve

problematic traffic, termination of the subscriber originating such traffic, terminating the customer's service or blocking calls, as well as possible referrals to relevant enforcement agencies where appropriate. In the alternative, if the calls are determined to be legitimate, LCB Solutions will memorialize its findings in writing as needed.

Ensuring Foreign Providers Are Not Using LCB Solutions to Carry or Process High-Volume Illegal Traffic onto the U.S. Network

Pursuant to 47 C.F.R. § 64.1200(n)(4) and its January 16, 2023 effective date, when LCB Solutions serves as a Gateway Provider for voice traffic that is routing through its network, LCB Solutions takes reasonable and effective steps discussed under Sections 5 and 6, above, to ensure that any Foreign Voice Service Provider or foreign Intermediate Provider from which LCB Solutions directly receives traffic is not using LCB Solutions, as a Gateway Provider, to carry or process a high volume of illegal traffic onto the U.S. network.

Authenticating Voice Traffic

Pursuant to 47 C.F.R. § 64.6301(a), when operating as a Voice Service Provider, LCB Solutions does the following (1) to the extent technically feasible, authenticates and verifies originator identification information for all SIP calls that exclusively transit its own network; (2) to the extent technically feasible, authenticates originator identification information for all SIP calls it originates and that it will exchange with another Voice Service Provider or Intermediate Provider and, to the extent technically feasible, transmit that call with authenticated caller identification information to the next Voice Service Provider or Intermediate Provider in the call path; and (3) verifies originator identification information for all SIP calls it receives from another Voice Service Provider or Intermediate Provider which it will terminate and for which the caller

identification information has been authenticated.¹⁰ Pursuant to 47 C.F.R. § 64.6302(b) and (c), when operating as a Gateway or Intermediate provider, LCB Solutions will, by no later than June 30, 2023, authenticate caller identification information for all calls it receives that use North American Numbering Plan resources that pertain to the United States in the caller ID field and for which the caller identification information has not been authenticated and which it will exchange with another provider as a SIP call.

3) Responding to Commission, Law Enforcement and ITG Traceback Requests

LCB Solutions Corp is committed to ensuring that its network is not utilized for the origination, termination or routing of unwanted and illegal robocalls. In accordance with the FCC's regulations 47 C.F.R. § 64.6305(b)(2) and 47 C.F.R. § 64.1200(n)(1)(ii), LCB Solutions Corp will respond to all traceback requests from the Commission, law enforcement, and the Industry Traceback Consortium ("ITG") within 24 hours¹² and will cooperate with such entities in investigating and stopping any illegal robo callers that attempt to use LCB network to carry or process calls. LCB Solutions will take the steps to effectively mitigate illegal traffic when it receives actual written notice of such traffic from the Commission through its Enforcement Bureau and will comply with the requirements of such notice and do so in accordance with the applicable FCC rules.¹³ Relatedly, in addition to responding to traceback requests within 24 hours, LCB Solutions has been a long standing member of the ITG Traceback Group. LCB Solutions cooperates with all traceback requests, participates in quarterly scheduled ITG Member calls, fully complies with the ITG Policies and Procedures; and follows the Best Practices set forth in Appendix A: Provider Best Practices of ITG's Policies and Procedures (Revised April 2022) ("ITG's Best Practices"), available at <https://tracebacks.org/wp-content/uploads/2022/04/ITG-Policies-and-Procedures-Updated-Apr2022.pdf> at Appendix A. These Best Practices include (1) Dedicated Point of Contact; (2) Ongoing Coordination; (3) Prompt Response; (4) Vet the Identity of Customers; (5) Mitigate

Traffic Source; (6) Analyze and Monitor Network Traffic; (7) Investigate and Mitigate Suspicious Calls and Calling Patterns; (8) Privacy of Call Traceback Information.¹⁴ To mitigate illegal robocalling, LCB Solutions' RMP has, among other things, incorporated the applicable Best Practices herein.

As part of its analysis and monitoring of network traffic, LCB Solutions Corp. maintains a Network Operations Center ("NOC") that provides continuous oversight of LCB Solutions' voice service operations. LCB Solutions' NOC staff is available 24-7-365 basis. The NOC is staffed by technicians and supervisors that have access to network engineering and vendor resource support, including additional support in the event of escalation incidents. LCB Solutions also maintains a team whose goal is to prevent fraudulent calls and abuse of our Company's network; to detect and terminate such fraud should it occur; and to respond to fraud complaints, law enforcement inquiries and traceback requests. LCB Solutions uses specific email distribution lists (ex; fraud@lcbisol.com) to ensure that fraud matters are directed to the appropriate team members and handled in a timely manner.

LCB Solutions Corp consistently analyzes its call detail records to identify problematic call patterns and their sources from where it sits in a myriad of traffic flows. LCB Solutions Corp then incorporates these learnings into its traffic data analytics and detection technologies to continually improve its capabilities to accurately detect suspected illegal activity and deploy mitigation measures.

3. Requiring Contractual Provisions to Mitigate Illegal Robocalls

This RMP applies to LCB Solutions' calling platforms and provides information on LCB Solutions' policies and procedures on the following topics that are discussed in turn below which "details the specific reasonable steps it has taken to avoid carrying or processing illegal robocall traffic":

- Implementing Knowing Your Customer and Know Your Upstream Provider Protocols.
- Requiring Contractual Provisions to Mitigate Illegal Robocalls.
- Validating Customer's Right to Use Telephone Numbers.
- Adhering to Prerequisites Before Accepting Traffic from Other Providers.
- Automatically Blocking Calls on a Do-Not-Originate List.
- Analyzing and Monitoring Network Traffic Routing Through LCB Solutions' Network.
- Third-Party Analytics Provider Investigating Suspicious Calling Patterns.
- Ensuring Foreign Providers Are Not Using LCB Solutions to Carry or Process High-Volume Illegal Traffic onto the U.S. Network.
- Authenticating Voice Traffic.
- Responding to Commission, Law Enforcement and ITG Traceback Requests.
- Designating an Employee Responsible for Addressing Robocall Mitigation-Related Issues.
- Updating LCB Solutions' RMD Submission and RMP.
- Training Employees.

Along with Implementation of the STIR/SHAKEN Program, LCB Solutions has processes and Procedures in place to authenticate the proper use of telephone numbers associated with calls routes over the LCB Solutions Network and combat number spoofing. If required by applicable law or regulation, LCB Solutions requires its customers to fully implement STIR/SHAKEN on their own networks. In cases where a customer is unable to fully implement STIR/SHAKEN, where permitted by applicable law or regulation, LCB Solutions may assist them with signing their traffic to ensure traceability across the PSTN and ensure all FCC requirements for transiting traffic to US telecommunications networks are fulfilled. In cases where our company signs traffic on

behalf of a customer network, the customer must agree to additional contractual terms governing their traffic, use of phone numbers and specific obligations to investigate and prevent any suspected robocalling or otherwise fraudulent traffic.

LCB Solutions Corp' standard service order also contains language prohibiting the misuse of telephone numbers (i.e., DIDs). For instance, customers are required to allocate all DIDs used in call processing, and errors associated with unallocated DIDs are a misuse of DIDs which are subject to monetary 6 penalties.

LCB Solutions Corp. may also, in its sole discretion, take other actions under LCB Solutions ' standard Service Order to address misuse of DIDs (or if our Company discovers or reasonably suspects any abuse or unlawful activity), including: commercially reasonable action on offending numbers in order to minimize misuse; verbal, e-mail or written warning notifying the customer of the misuse and the corrective action that must be taken; suspension, with or without warning, all or part of a customer's service; and/or termination, with or without warning, all or part of customer's service and may terminate customer's agreement.

In addition, LCB Solutions' standard service order requires customers to cooperatively address unlawful use or misuse of DIDs in a timely manner.

LCB Solutions also has processes and systems in place to ensure that customer telephone number assignment is properly inventoried and tracked. Prior to accessing LCB Solutions Corp' telephone number portal to order telephone numbers, a customer must establish an account profile, which is established after customer vetting is complete, contracts finalized, and network services (e.g., trunk groups) ordered. Only approved customers may access the telephone number portal, and each customer has a LCB Solutions administrator assigned to their account.

4. Only Accepting Traffic from Providers in the RMD

Accepting traffic from domestic Voice Service Providers. In accordance with 47 C.F.R § 64.6305(e)(1), LCB SOLUTIONS CORP accepts calls directly from a domestic Voice Service Provider only if that Voice Service Provider's filing appears in the RMD and that filing has not been delisted pursuant to an enforcement action.

Providers. In accordance with 47 C.F.R § 64.6305(e)(2), beginning 90 days after the deadline for filing certifications pursuant to 47 C.F.R § 64.6305(d) (which is April 11, 2023), LCB SOLUTIONS CORP only accept calls directly from a Foreign Voice Service Provider or Foreign Intermediate Provider that uses North American Numbering Plan resources that pertain to the United States in the caller ID field to send voice traffic to residential or business subscribers in the United States, only if that foreign provider's filing appears in the RMD and that filing has not been de-listed pursuant to an enforcement action.

In accordance with 47 C.F.R § 64.6305(e)(3), beginning April 11, 2023, LCB Solutions only accepts calls directly from a Gateway Provider only if that Gateway Provider's filing (a) appears in the RMD, (b) shows that the Gateway Provider has affirmatively submitted the filing, and (c) has not been de-listed pursuant to an enforcement action.

Intermediate Provider that uses North American Numbering Plan resources that pertain to the United States in the caller ID field to send voice traffic to residential or business subscribers in the United States, only if that foreign provider's filing appears in the RMD and that filing has not been delisted pursuant to an enforcement action.

5. Blocking Calls on a Do-Not-Originate List

In accordance with FCC Rules, 47 C.F.R. § 64.1200(k)(2) and (o)(1)-(4), LCB SOLUTIONS CORP blocks calls purporting to originate from a number on a reasonable Do-Not-Originate ("DNO") list that is associated with North American Numbering Plan numbers. LCB SOLUTIONS CORP has protocols in place to detect DNO calls and blocks calls that are determined to originate from a DNO number.

This DNO Number includes:

Numbers for which the subscriber to which the number is assigned has requested that calls purporting to originate from that number be blocked because the number is used for inbound calls only.

North American Numbering Plan (NANP) numbers that are not valid.

Valid NANP numbers that are not allocated to a provider by the NANP

Administrator, and also Valid NANP numbers that are allocated to a provider by the NANP, administrator, but are unused, as long as the provider blocking the calls is the allocate of the number and confirms that the number is unused or has obtained verification from the allocate that the number is unused at the time of blocking.

6. Analyzing and Monitoring Network Traffic Routing Through LCB Solutions Corp Network

Upon receiving call traffic, LCB SOLUTIONS CORP also Integrates the help of third-party Network vendor solutions for real-time traffic analysis. Vendors listed below.

a.- Infobip

b.- Bandwidth

We analyze and monitor all call traffic that originates on, terminates to, or routes through LCB Solutions Corp voice network. Consistent with Principal No. 5 of the FCC's Caller ID Authentication Best Practices, LCB SOLUTIONS CORP monitors the voice traffic patterns on a twenty-four (24) hour basis to identify behaviors that are consistent with illegal robocalling.

In this regard, LCB SOLUTIONS CORP has in place anti-fraud processes that enable it to, among other things, monitor network usage, identify suspicious network activity (based on call duration, abnormal call patterns, atypical call activity, and subscriber information), receive automatic alerts, investigate traffic to distinguish fraud from

honest customer usage, and resolve cases intelligently on a case-by-case basis. When analyzing and monitoring call traffic, if LCB SOLUTIONS CORP discovers call patterns that are consistent with illegal robocalling, LCB SOLUTIONS CORP, after further investigation, takes appropriate action to address such behaviors, which may include working 5 with the originating customer to resolve problematic traffic, blocking the problematic calls and/or terminating the customer's service.

7. Investigating Suspicious Calling Patterns actions:

When analyzing and monitoring call traffic, if LCB Solutions discovers call patterns that are consistent with illegal robocalling, LCB Solutions Corp, after further investigation, takes appropriate action to address such behaviors and mitigate such traffic. These measures include, but are not limited to, working with the originating customer to resolve problematic traffic, termination of the subscriber originating such traffic, terminating the customer's service or blocking calls, as well as possible referrals to relevant enforcement agencies where appropriate. In the alternative, if the calls are determined to be legitimate, our Company will memorialize its findings in writing as needed.

8. Authenticating Voice Traffic disclosures

Pursuant to 47 C.F.R. § 64.6301(a), when operating as a Voice Service Provider, LCB Solutions does the following (1) to the extent technically feasible, authenticates and verifies originator identification information for all SIP calls that exclusively transit its own network; (2) to the extent technically feasible, authenticates originator identification information for all SIP calls it originates and that it will exchange with another Voice Service Provider or Intermediate Provider and, to the extent technically feasible, transmit that call with authenticated caller identification information to the next Voice Service Provider or Intermediate Provider in the call path; and (3) verifies originator identification information for all SIP calls it receives from another Voice Service Provider or Intermediate Provider which it will terminate and for which the caller identification information has been authenticated. (10)

Pursuant to 47 C.F.R. § 64.6302(b) and (c), when operating as a Gateway or Intermediate provider, LCB SOLUTIONS will, by no later than June 30, 2023, authenticate caller identification information for all calls it receives that use North American Numbering Plan resources that pertain to the United States in the caller ID field and for which the caller identification information has not been authenticated and which it will exchange with another provider as a SIP call.(11)

Notes: 47 C.F.R. § 64.6301(a)

11 47 C.F.R. § 64.6302(b) and (c).

Our Company has deployed and currently utilizes call analytics systems to identify and block illegal traffic originating from or transiting its network. This includes monitoring call patterns, Call volume, call durations, and answer-seizure ratios, and other anomalous behaviors are indicative of illegal robocalling campaigns.

Summary:

LCB Solutions Corp takes a multi-pronged approach to Robocall Mitigation.

For outbound robocall mitigation from our customers to the PSTN (Know Your Customer), we:

- Provide an easy way for other carriers to report nuisance calls to us and investigate all reports with a written response
- Have implemented strong know-your-customer policies
- Have implemented strong know-your-upstream-provider policies
- Require positive identification of all customers with a FEIN or Driver's License
- Will not serve any customer which is not a verifiable US-based corporation or LLC
- Require executed contracts with all commercial customers which specifically prohibit the use of our service for any illegal activity
- Suspend and/or terminate service to any customer found to have violated our agreement after notice and an opportunity to cure
- Ensure that all outbound calls are being properly signed via STIR/SHAKEN.
- Do not permit our numbers to be activated or used for text messaging with any other provider
- Keep all call detail records and SMS for at least 3 years

- Routinely monitor call flows and traffic volumes from customers to detect anomalies.
- Investigate traffic bursts and other suspicious traffic patterns when they occur
- For inbound robocall mitigation from the PSTN to our customers (Know Your Upstream Provider), we:
 - Source all PSTN connectivity from regulated US carriers.
 - Provide an easy way for our customers to report nuisance calls to us and investigate all reports
- Allow customers to blacklist callers on a per-customer basis.
- Routinely monitor call flows and traffic volumes from other carriers.
- Investigate traffic bursts and other suspicious traffic patterns when they occur.
- Keep all call detail records and SMS for at least 5 years

Right to Refuse Calls / Third Party Analytics Vendor

Pursuant to 47 CFR § 64.6305(d)(2)(ii), (e)(2)(ii), and (f)(2)(ii), LCB Solutions Network is required to describe whether it uses any third-party analytics vendor(s) and the name(s) of such vendor(s). LCB Solutions engages in, Inc. engages in the services of a third-party analytics vendor; more specifically, LCB Solutions utilizes the services of TNS Call Guardian.

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1. Provider Role in Call Chain

LCB Solutions Corp is a voice service provider delivering hosted telephony, call analytics, and call tracking services primarily to automotive dealerships and related businesses nationwide.

2. STIR/SHAKEN Implementation

LCB Solutions Corp acknowledges the FCC's mandate for STIR/SHAKEN (Secure Telephone Identity Revisited/Signature-based Handling of Asserted information using Tokens) implementation. As of 2025-09-04, LCB Solutions Corp has fully implemented the STIR/SHAKEN authentication framework in the IP portions of its network. This full implementation means that all calls originating on our network are signed with STIR/SHAKEN attestations.

Robocall Mitigation Measures

- a. Customer Vetting & Onboarding
 - Primarily provide services to established automotive dealerships.
 - Clients regulated under FTC, SOX, and banking/consumer protection.
 - No automated/anonymous signups.
- b. Ongoing Monitoring & Call Analytics
 - In-house analytics to detect suspicious traffic.
 - Third-party monitoring supplements, Provided by our vendor's ***Bandwidth and Infobip***.
 - Immediate investigation/suspension for unlawful activity.
- c. Vendor/Upstream/Partner Due Diligence
 - Contractual and operational controls with FCC regulated upstream providers vendors (***Bandwidth and Infobip***.)

LCB Solutions Corp has two upstream providers, which receive voice traffic:

1. Bandwidth Communications, 2230 Bandmate Way,
Raleigh, NC, USA 27607
Phone: 855-864-7776

2. Infobip LLC, 300 Elliott Ave, Suite 200
111 Town Square Place,
Suite 830, Jersey City, NJ 07310, USA
Phone: 877-786-8151

- No interconnection with unvetted providers.

Employee Training

LCB Solutions Corp has implemented a training program that focuses on ensuring that personnel receive appropriate training on issues related to illegal robocalls. Each member of the LCB Solutions NOC Department and all personnel responsible for addressing fraud reports and/or traceback requests will receive a copy of this RMP for their review and records. LCB Solutions will also include this RMP in its package of policy documents and other relevant materials that are distributed to all employees on an annual basis. Employees are instructed to direct any questions about the RMP to the contact identified in Section 11 above. Through this approach, LCB Solutions will seek to ensure that each of its employees are aware of the contents of this RMP, thereby increasing its effectiveness. The Director of Regulatory Affairs conducts annual meetings with key internal teams—including Sales, Customer Support, and Back-Office Support—to review the LCB Solutions Robocall Mitigation Plan, the company's Know Your Customer (KYC) processes, and related procedures for identifying and addressing unwanted or illegal traffic. These sessions reinforce LCB Solutions's compliance obligations, ensure that personnel across operational and customer-facing functions understand their roles in preventing illegal robocalls, and promote consistent application of the company's mitigation policies.

LCB Solutions Corp commits to responding fully to traceback requests within 24 hours and cooperates with the Industry Traceback Group and other enforcement bodies.

3. Contact and Corporate Information

- Business Address: PO Box 4075 Santa Fe Springs CA 90670
- Compliance Officer: Luis Chavez, CEO
- Principals: LCB Solutions Corp

4. Certification

LCB Solutions Corp certifies that:

- All calls originated are subject to a robocall mitigation program.
- It has fully implemented STIR/SHAKEN.
- It maintains effective measures to prevent unlawful robocalls.
- It has disclosed its corporate ownership and affiliates.
- It will continue to respond fully to traceback requests within 24 hours.